

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11 Case No.
: :
MOTORS LIQUIDATION COMPANY, *et al.*, : 09-50026 (REG)
f/k/a General Motors Corp., *et al.* :
: :
Debtors. : (Jointly Administered)
: :
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**NOTICE OF MATTER SCHEDULED
FOR HEARING ON APRIL 12, 2011 AT 9:45 A.M.**

Location of Hearing: United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton U.S. Custom House, before the Honorable Robert E. Gerber, United States Bankruptcy Judge, Courtroom 621, One Bowling Green, New York, NY 10004-1408

I. CONTESTED MATTER

1. Motion of the TPC Lenders for Entry of an Order (I) Initiating Valuation Proceeding in Accordance with the Sale Order, and (II) Establishing a Schedule with Respect to the Valuation Proceedings (**ECF No. 8616**)

Responses Filed:

- A. Debtors' Response to Motion of TPC Lenders for Entry of Order (I) Initiating Valuation Proceedings in Accordance with the Sale Order, and (II) Establishing a Schedule with Respect to the Valuation Proceedings (**ECF No. 9091**)
- B. Response by General Motors LLC to Motion of the TPC Lenders for Entry of an Order (I) Initiating Valuation Proceedings in Accordance with the Sale Order, and (II) Establishing a Schedule with Respect to the Valuation Proceedings (**ECF No. 9080**)
 - a. Brief of General Motors LLC in Support of Using A "Fair Market Value" Valuation Standard to Value the TPC Property (**ECF No. 9494**)

- b. Reply Memorandum of Law of General Motors LLC (I) in Response to the Memorandum of Law of the TPC Lenders Concerning the Proper Valuation Methodology Under the Sale Order and Section 506 of the Bankruptcy Code to Be Applied to the TPC Property, and (II) in Further Support of Using a “Fair Market Value” Valuation Standard to Value the TPC Property (**ECF No. 9797**)

Replies Filed:

- C. TPC Lenders’ Reply in Support of Their Motion for Entry of an Order (I) Initiating Valuation Proceedings in Accordance with the Sale Order, and (II) Establishing a Schedule with Respect to the Valuation Proceedings (**ECF No. 9116**)
 - a. Memorandum of Law of the TPC Lenders Concerning the Proper Valuation Methodology Under the Sale Order and Section 506 of the Bankruptcy Code to be Applied to the TPC Property (**ECF No. 9493**)
 - b. Response of the TPC Lenders to the Brief of General Motors LLC in Support of Using a “Fair Market” Valuation Standard to Value the TPC Property (**ECF No. 9796**)

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Additional Documents:

- D. So Ordered Stipulation Regarding Briefing Schedule to Address Valuation Methodology Issues Related to the Motion of the TPC Lenders For Entry of an Order (I) Initiating Valuation Proceedings in Accordance with the Sale Order, and (Ii) Establishing a Schedule with Respect to the Valuation Proceedings (**ECF No. 9281**)
- E. Declaration of Steven M. Bierman in Support of the Memorandum of Law of the TPC Lenders Concerning the Proper Valuation Methodology Under the Sale Order and Section 506 of the Bankruptcy Code to be Applied to the TPC Property (**ECF No. 9495**)

Status: This matter is going forward.

Dated: New York, New York
April 8, 2011

/s/ Joseph H. Smolinsky

Harvey R. Miller

Stephen Karotkin

Joseph H. Smolinsky

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